

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

CAITLIN O’CONNOR,

Plaintiff,

v.

THE LAMPO GROUP, LLC,

Defendant.

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Case No. 3:20-cv-00628

District Judge Richardson

Magistrate Judge Frensley

Jury Demand

**DEFENDANT’S MOTION FOR SUMMARY JUDGMENT  
AS TO COUNT V OF PLAINTIFF’S THIRD AMENDED COMPLAINT**

Defendant, The Lampo Group, LLC, pursuant to Rule 56 of the Federal Rules of Civil Procedure and the Court’s Order at Doc. No. 107, moves for summary judgment with respect to any remaining claims in Count V of Plaintiff’s Third Amended Complaint (Doc. #37).

As explained in Defendant’s concurrently filed memorandum of law (Doc. #109), any remaining claims in Count V are ripe for summary judgment, fail as a matter of law, and should be dismissed.

Respectfully submitted,

/s/Daniel Crowell

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**CERTIFICATE OF SERVICE**

I certify that, on July 9, 2025, I filed the foregoing document via the Court's electronic filing system, which will automatically notify and send a copy to:

Heather Moore Collins  
Ashley Shoemaker Walter  
HMC Civil Rights, PLLC

*Attorneys for Plaintiff*

/s/Daniel Crowell

Daniel Crowell (TN #31485)

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